

Closure Report

K7CT6-190806-C-1440

Site Description

Site Name:	Sterling Silver 34 Federal #2
Company:	Oxy USA Inc.
Legal Description:	U/L E, Section 34, T23S, R31E
County:	Eddy County, NM
GPS Coordinates:	N 32.26279 W-103.77203

Release Data

Date of Release:	12/29/18
Type of Release:	Oil
Source of Release:	Human error- valve did not get turned off at the heater
Volume of Release:	20 bbls
Volume Recovered:	17 bbls

Remediation Specifications

Remediation Parameters:	Excavated the entire leak to a depth of 6 inches. Obtained bottom confirmation samples. Backfilled the site with clean soil.	
Remediation Activities:	7/15/19 to 7/22/19	
Plan Sent to OCD:	2/21/19	Email from Cliff Brunson to Victoria Venegas
OCD Approval of Plan:	2/28/19	Email from Victoria Venegas to Cliff Brunson
Plan Sent to BLM:	2/21/19	Email from Cliff Brunson to James Amos
BLM Approval of Plan:	6/18/19	Email from James Amos to Cliff Brunson

Supporting Documentation

Initial C-141	Signed 1/8/19
C-141, page 6	Signed and included
Site Diagram	January 2019
Pictures	Remediation photos prior to backfill

Request for Closure

Based on the completion of the remediation plan, BBC International, Inc. requests closure approval from NMOCD.





Cliff Brunson, President, BBC International, Inc.

08/01/2019

Oxy, Sterling Silver 34 Federal #2 CTB

Leak date: 12/29/18
Eddy County, NM
API# 30-015-27936
2RP-5176

Legend

-  6 inch Excavation across entire leak area
-  Confirmation sample points
-  Leak Area
-  Sample points



Oxy, Sterling Silver 34 Federal #2 CTB

Sample points

SP1, N 32.26265 W-103.77174

SP2, N 32.26274 W-103.77174

SP3, N 32.26276 W-103.77188

SP4, N 32.26278 W-103.77210

SP5, N 32.26280 W-103.77227

NORTH, N 32.26288 W-103.77196

SOUTH, N 32.26270 W-103.77194

EAST, N 32.26265 W-103.77162

WEST, N 32.26277 W-103.77236

Confirmation sample points

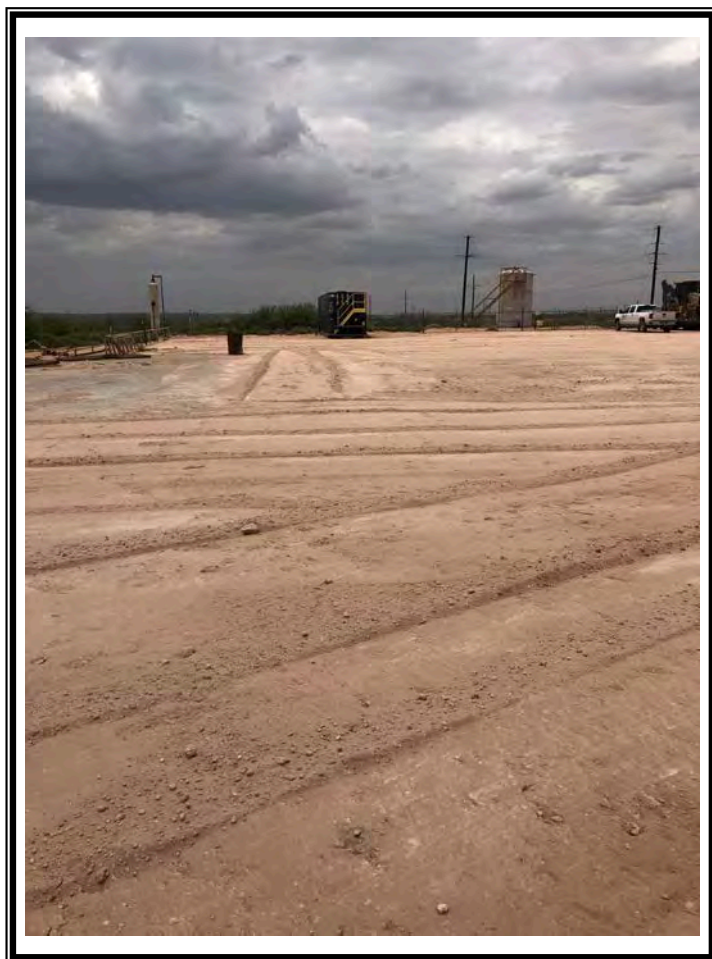
B1, N 32.26291 W-103.77226

B2, N 32.26275 W-103.77230

B3, N 32.26279 W-103.77200

B4, N 32.26276 W-103.77177

B5, N 32.26261 W-103.77173





Laboratory Analytical Results Summary
Sterling Silver 34 Federal #2 CTB

		Sample ID	BOTTOM 1
Analyte	Method	Date	7/19/19
			mg/kg
Benzene	BTEX 8021B		<0.050
Toluene	BTEX 8021B		<0.050
Ethylbenzene	BTEX 8021B		<0.050
Total Xylenes	BTEX 8021B		<0.150
Total BTEX	BTEX 8021B		<0.300
Chloride	SM4500Cl-B		16
GRO	TPH 8015M		<10.0
DRO	TPH 8015M		<10.0
EXT DRO	TPH 8015M		<10.0

		Sample ID	BOTTOM 4
Analyte	Method	Date	7/19/19
			mg/kg
Benzene	BTEX 8021B		<0.050
Toluene	BTEX 8021B		<0.050
Ethylbenzene	BTEX 8021B		<0.050
Total Xylenes	BTEX 8021B		<0.150
Total BTEX	BTEX 8021B		<0.300
Chloride	SM4500Cl-B		<16.0
GRO	TPH 8015M		<10.0
DRO	TPH 8015M		<10.0
EXT DRO	TPH 8015M		<10.0

		Sample ID	BOTTOM 2
Analyte	Method	Date	7/19/19
			mg/kg
Benzene	BTEX 8021B		<0.050
Toluene	BTEX 8021B		<0.050
Ethylbenzene	BTEX 8021B		<0.050
Total Xylenes	BTEX 8021B		<0.150
Total BTEX	BTEX 8021B		<0.300
Chloride	SM4500Cl-B		32
GRO	TPH 8015M		<10.0
DRO	TPH 8015M		<10.0
EXT DRO	TPH 8015M		<10.0

		Sample ID	BOTTOM 5
Analyte	Method	Date	7/19/19
			mg/kg
Benzene	BTEX 8021B		<0.050
Toluene	BTEX 8021B		<0.050
Ethylbenzene	BTEX 8021B		<0.050
Total Xylenes	BTEX 8021B		<0.150
Total BTEX	BTEX 8021B		<0.300
Chloride	SM4500Cl-B		16
GRO	TPH 8015M		<10.0
DRO	TPH 8015M		<10.0
EXT DRO	TPH 8015M		<10.0

		Sample ID	BOTTOM 3
Analyte	Method	Date	7/19/19
			mg/kg
Benzene	BTEX 8021B		<0.050
Toluene	BTEX 8021B		<0.050
Ethylbenzene	BTEX 8021B		<0.050
Total Xylenes	BTEX 8021B		<0.150
Total BTEX	BTEX 8021B		<0.300
Chloride	SM4500Cl-B		<16.0
GRO	TPH 8015M		<10.0
DRO	TPH 8015M		<10.0
EXT DRO	TPH 8015M		<10.0



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

July 22, 2019

Cliff Brunson

BBC International, Inc.

P.O. Box 805

Hobbs, NM 88241

RE: STERLING SILVER 34 # 2

Enclosed are the results of analyses for samples received by the laboratory on 07/19/19 8:15.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-18-11. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive, flowing style.

Celey D. Keene

Lab Director/Quality Manager

Analytical Results For:

BBC International, Inc.
Cliff Brunson
P.O. Box 805
Hobbs NM, 88241
Fax To: (575) 397-0397

Received:	07/19/2019	Sampling Date:	07/19/2019
Reported:	07/22/2019	Sampling Type:	Soil
Project Name:	STERLING SILVER 34 # 2	Sampling Condition:	Cool & Intact
Project Number:	(12-28-18)	Sample Received By:	Tamara Oldaker
Project Location:	OXY		

Sample ID: BOTTOM 1 (H902483-01)

BTX 8021B		mg/kg		Analyzed By: ms					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	07/19/2019	ND	1.99	99.5	2.00	0.995	
Toluene*	<0.050	0.050	07/19/2019	ND	2.07	103	2.00	3.16	
Ethylbenzene*	<0.050	0.050	07/19/2019	ND	1.93	96.5	2.00	1.03	
Total Xylenes*	<0.150	0.150	07/19/2019	ND	5.83	97.2	6.00	1.60	
Total BTX	<0.300	0.300	07/19/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID) 103 % 73.3-129

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	07/19/2019	ND	416	104	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	07/19/2019	ND	226	113	200	0.171	
DRO >C10-C28*	<10.0	10.0	07/19/2019	ND	219	109	200	1.20	
EXT DRO >C28-C36	<10.0	10.0	07/19/2019	ND					

Surrogate: 1-Chlorooctane 87.4 % 41-142

Surrogate: 1-Chlorooctadecane 93.3 % 37.6-147

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

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Cliff Brunson
P.O. Box 805
Hobbs NM, 88241
Fax To: (575) 397-0397

Received:	07/19/2019	Sampling Date:	07/19/2019
Reported:	07/22/2019	Sampling Type:	Soil
Project Name:	STERLING SILVER 34 # 2	Sampling Condition:	Cool & Intact
Project Number:	(12-28-18)	Sample Received By:	Tamara Oldaker
Project Location:	OXY		

Sample ID: BOTTOM 2 (H902483-02)

BTEx 8021B		mg/kg		Analyzed By: ms					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	07/20/2019	ND	1.99	99.5	2.00	0.995	
Toluene*	<0.050	0.050	07/20/2019	ND	2.07	103	2.00	3.16	
Ethylbenzene*	<0.050	0.050	07/20/2019	ND	1.93	96.5	2.00	1.03	
Total Xylenes*	<0.150	0.150	07/20/2019	ND	5.83	97.2	6.00	1.60	
Total BTEx	<0.300	0.300	07/20/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID) 102 % 73.3-129

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	32.0	16.0	07/19/2019	ND	416	104	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	07/19/2019	ND	226	113	200	0.171	
DRO >C10-C28*	<10.0	10.0	07/19/2019	ND	219	109	200	1.20	
EXT DRO >C28-C36	<10.0	10.0	07/19/2019	ND					

Surrogate: 1-Chlorooctane 87.4 % 41-142

Surrogate: 1-Chlorooctadecane 92.6 % 37.6-147

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*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

BBC International, Inc.
Cliff Brunson
P.O. Box 805
Hobbs NM, 88241
Fax To: (575) 397-0397

Received:	07/19/2019	Sampling Date:	07/19/2019
Reported:	07/22/2019	Sampling Type:	Soil
Project Name:	STERLING SILVER 34 # 2	Sampling Condition:	Cool & Intact
Project Number:	(12-28-18)	Sample Received By:	Tamara Oldaker
Project Location:	OXY		

Sample ID: BOTTOM 3 (H902483-03)

BTX 8021B		mg/kg		Analyzed By: ms					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	07/20/2019	ND	1.99	99.5	2.00	0.995	
Toluene*	<0.050	0.050	07/20/2019	ND	2.07	103	2.00	3.16	
Ethylbenzene*	<0.050	0.050	07/20/2019	ND	1.93	96.5	2.00	1.03	
Total Xylenes*	<0.150	0.150	07/20/2019	ND	5.83	97.2	6.00	1.60	
Total BTX	<0.300	0.300	07/20/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID) 102 % 73.3-129

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	07/19/2019	ND	416	104	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	07/19/2019	ND	226	113	200	0.171	
DRO >C10-C28*	<10.0	10.0	07/19/2019	ND	219	109	200	1.20	
EXT DRO >C28-C36	<10.0	10.0	07/19/2019	ND					

Surrogate: 1-Chlorooctane 90.3 % 41-142

Surrogate: 1-Chlorooctadecane 94.1 % 37.6-147

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Analytical Results For:

BBC International, Inc.
Cliff Brunson
P.O. Box 805
Hobbs NM, 88241
Fax To: (575) 397-0397

Received: 07/19/2019
Reported: 07/22/2019
Project Name: STERLING SILVER 34 # 2
Project Number: (12-28-18)
Project Location: OXY

Sampling Date: 07/19/2019
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Tamara Oldaker

Sample ID: BOTTOM 4 (H902483-04)

BTEx 8021B		mg/kg		Analyzed By: ms					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	07/20/2019	ND	1.99	99.5	2.00	0.995	
Toluene*	<0.050	0.050	07/20/2019	ND	2.07	103	2.00	3.16	
Ethylbenzene*	<0.050	0.050	07/20/2019	ND	1.93	96.5	2.00	1.03	
Total Xylenes*	<0.150	0.150	07/20/2019	ND	5.83	97.2	6.00	1.60	
Total BTEx	<0.300	0.300	07/20/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID) 101 % 73.3-129

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	07/19/2019	ND	416	104	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	07/19/2019	ND	226	113	200	0.171	
DRO >C10-C28*	<10.0	10.0	07/19/2019	ND	219	109	200	1.20	
EXT DRO >C28-C36	<10.0	10.0	07/19/2019	ND					

Surrogate: 1-Chlorooctane 89.0 % 41-142

Surrogate: 1-Chlorooctadecane 93.5 % 37.6-147

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Celey D. Keene, Lab Director/Quality Manager

Analytical Results For:

BBC International, Inc.
Cliff Brunson
P.O. Box 805
Hobbs NM, 88241
Fax To: (575) 397-0397

Received:	07/19/2019	Sampling Date:	07/19/2019
Reported:	07/22/2019	Sampling Type:	Soil
Project Name:	STERLING SILVER 34 # 2	Sampling Condition:	Cool & Intact
Project Number:	(12-28-18)	Sample Received By:	Tamara Oldaker
Project Location:	OXY		

Sample ID: BOTTOM 5 (H902483-05)

BTEx 8021B		mg/kg		Analyzed By: ms						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	07/20/2019	ND	1.99	99.5	2.00	0.995		
Toluene*	<0.050	0.050	07/20/2019	ND	2.07	103	2.00	3.16		
Ethylbenzene*	<0.050	0.050	07/20/2019	ND	1.93	96.5	2.00	1.03		
Total Xylenes*	<0.150	0.150	07/20/2019	ND	5.83	97.2	6.00	1.60		
Total BTEx	<0.300	0.300	07/20/2019	ND						

Surrogate: 4-Bromofluorobenzene (PID) 101 % 73.3-129

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	16.0	16.0	07/19/2019	ND	416	104	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	07/19/2019	ND	226	113	200	0.171	
DRO >C10-C28*	<10.0	10.0	07/19/2019	ND	219	109	200	1.20	
EXT DRO >C28-C36	<10.0	10.0	07/19/2019	ND					

Surrogate: 1-Chlorooctane 91.1 % 41-142

Surrogate: 1-Chlorooctadecane 97.1 % 37.6-147

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*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

Notes and Definitions

ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

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*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



ARDINAL LABORATORIES

101 East Marland, Hobbs, NM 88240
(505) 393-2326 FAX (505) 393-2476

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company Name: BBC International, Inc.

Project Manager: Cliff Brunson

Address: P.O. Box 805

City: Hobbs

Phone #: 575-397-6388

Project #:

Project Name: STERLING SILVER 34 #2 - 12-28-18

Project Location:

Sampler Name: ROGER HERNANDEZ

FOR LAB USE ONLY

Lab I.D.

Sample I.D.

H902483

1 Bottom 1
2 Bottom 2
3 Bottom 3
4 Bottom 4
5 Bottom 5

(G)RAB OR (C)OMP.

CONTAINERS

GROUNDWATER

WASTEWATER

SOIL

OIL

SLUDGE

OTHER :

ACID/BASE:

ICE / COOL

OTHER :

DATE TIME

7-19-19 7:30 AM
7-19-19 7:40 AM
7-19-19 7:50 AM
7-19-19 8:00 AM
7-19-19 8:10 AM

Chloride

TPH Ext

BTX

BILL TO

P.O. #:

Company: Oxy

Attn: W. D. Hrick

Address:

City:

State: Zip:

Phone #:

Fax #:

ANALYSIS REQUEST

PLEASE NOTE: Liability and Damages: Cardinal's liability and client's exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analyses. All claims including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within 30 days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.

Relinquished By:

Date: 7/18/19

Received By:

Phone Result: ☐ Yes ☐ No Add'l Phone #:Fax Result: ☐ Yes ☐ No Add'l Fax #:

Relinquished By:

Date: 7-19-19

Received By:

REMARKS: RUSH

Delivered By: (Circle One)

Collected 3.7%

Sample Condition

CHECKED BY: (Initials)

Sampler - UPS - Bus - Other:

3.3% #497

Cool Intact

40

State of New Mexico
Oil Conservation Division

Incident ID	
District RP	2RP-5176
Facility ID	
Application ID	

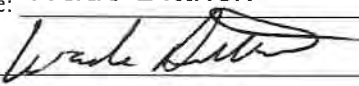
Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

Closure Report Attachment Checklist: *Each of the following items must be included in the closure report.*

- ☐ A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- ☐ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- ☐ Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- ☐ Description of remediation activities

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: Wade Dittrich Title: Environmental Coordinator
Signature:  Date: 7-31-18
email: wade_dittrich@oxy.com Telephone: (575) 390-2828

OCD Only

Received by: _____ Date: _____

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: _____ Date: _____

Printed Name: _____ Title: _____